

1 **ANDERSEN LAW FIRM, LTD.**  
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10 *Attorney for Plaintiff*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 PAUL IACOVACCI,

14 Plaintiff,

15 v.

16 ROBERT W. NOKLEY, SR., an individual;  
17 NOKLEY GROUP, LLC, a Nevada limited  
18 liability company; DOE DEFENDANTS I  
19 THROUGH X; and ROE CORPORATIONS XI  
20 THROUGH XX,

21 Defendants.

Case No. 2:17-cv-00148-MMD-NJK

**CONFESSION OF JUDGMENT**

22 Pursuant to NRS 17.090 through NRS 17.110, Defendants ROBERT W. NOKLEY, SR., and  
23 NOKLEY GROUP, LLC ("Defendants") hereby confess judgment in favor of Plaintiff PAUL  
24 IACOVACCI ("Plaintiff") as follows:

25 1. Defendants admit owing Plaintiff the principal amount of \$200,000.00 arising from  
26 certain acts and omissions detailed in the above-captioned proceeding.

27 2. Plaintiff and Defendants have entered into a settlement agreement contained within a  
Stipulation filed with the Court in the above-captioned proceeding ("Stipulation"), the terms of which  
Stipulation are incorporated and made a part of this Confession of Judgment by this reference

3. Defendants shall pay Plaintiff the total sum of \$200,000.00 ("Settlement Payment"),  
according to the following payment schedule: (i) \$5,000.00 due on or before March 3, 2017; (ii)

1 \$5,000.00 due no later than forty-five (45) days following execution of the Stipulation; (iii) \$5,000.00  
2 due no later than seventy-five (75) days following execution of the Stipulation; (iv) \$35,000.00 due no  
3 later than one hundred five (105) days following execution of the Stipulation; and (v) \$150,000.00 due  
4 no later than one hundred sixty-five (165) days following execution of the Stipulation.

5 4. Defendants agree to provide the following within three (3) days of execution of the  
6 Stipulation: (i) a complete accounting of NG and the Receivables; (ii) access to all books and records  
7 of NG, including all of NG's financial accounts; and (iii) a complete and accurate personal financial  
8 statement for Nokley, signed under penalty of perjury (together, "Financial Information").

9 5. Defendants waive and acknowledge that they are waiving any and all counterclaims and  
10 offsets against Plaintiff, as well as any and all rights to a hearing or a trial prior to the entry of judgment  
11 against them. It is agreed that the only defense to the entry of judgment as agreed shall be that the debt  
12 has, in fact, been paid in full, and that Defendants have complied with paragraph 4(i) (ii) or (iii). If  
13 Defendants contends that there is an error in computation, in calculating interest, or in failing to allow  
14 full credit for all payments made, they agree that their exclusive remedy shall be to seek reduction of  
15 the amount of judgment after entry thereof. Defendants also waive all challenges to jurisdiction and  
16 venue, and agrees that Nevada law shall control the terms and conditions of all agreements with  
17 Plaintiff from this time forward.

18 6. Upon presentation of this Confession of Judgment, together with the affidavit  
19 referenced above to the Court, the Court is requested and instructed to immediately enter this  
20 Confession of Judgment as a judgment in favor of Plaintiff and against the Defendants.

21 7. It is understood and agreed that Plaintiff will not file said Confession of Judgment unless  
22 the Defendants fail to timely make any payment when due, fail to honor any check when presented, or  
23 fails to provide the required Financial Information; and upon such occurrence, that Plaintiff may then  
24 file this Judgment with the United States District Court, District of Nevada. It is further understood  
25 and agreed that prior to presenting this Confession of Judgment to the Court, Plaintiff will provide  
26 notice of default and an opportunity to cure, such notice to be provided to Defendants counsel of record  
27 via certified mail at least ten (10) days prior to filing this Confession of Judgment with the Court.

1           8.     If Defendants fail to make the required Settlement Payment according to the schedule  
2 set forth in the Stipulation, fail to provide the required Financial Information as required by the  
3 Stipulation, or otherwise fail to comply with the Stipulation, Plaintiff will be free to execute on this  
4 Judgment in the principal amount of \$200,000.00, plus any additional attorneys' fees, costs of litigation  
5 and filing of the judgment, and related costs, plus post-judgment interest at the statutory rate on the  
6 outstanding balance until the judgment is paid in full.

7           Dated this 2nd day of May, 2017.

8  
9     Prepared by:

10    ANDERSEN LAW FIRM, LTD.

11    By: 

12       Ryan A. Andersen, Esq.  
13       Nevada Bar No. 12321  
14       101 Convention Center Drive  
15       Suite 600  
16       Las Vegas, Nevada 89109

17    Attorney for Plaintiff  
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ANDERSEN  
— LAW FIRM —  
LTD

**VERIFICATION OF ROBERT W. NOKLEY, SR.**

STATE OF NEVADA       )  
                                   )  
 COUNTY OF CLARK       )       ss.

I, ROBERT W. NOKLEY, SR., being first duly sworn, deposes and states:

I have read the foregoing Confession of Judgment and know the contents thereof, acknowledge that it is true and accurate and that I am duly authorized and qualified to execute this instrument on my own behalf.


I hereby confess, authorize, request, and direct the entry of, when filed by the Clerk of the Court, this Confession of Judgment, which shall be a judgment in favor of Plaintiff against me in the amount of \$200,000.00, including any additional attorneys' fees, costs of litigation and filing of the judgment, and related costs, plus post-judgment interest at the statutory rate on the outstanding balance until the judgment is paid in full.

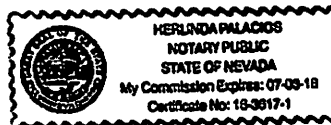
  
 ROBERT W. NOKLEY, SR.

Address:

1891 Tempting Choice Ave  
Las Vegas, NV. 89131

Subscribed and sworn to before me  
 this 1<sup>st</sup> day of ~~February~~, 2017.

  
 NOTARY PUBLIC



VERIFICATION OF NOKLEY GROUP, LLC

STATE OF NEVADA       )  
                                   )  
 COUNTY OF CLARK       )       ss.

I, ROBERT W. NOKLEY, SR., as manager and authorized representative of NOKLEY GROUP, LLC, a Nevada limited liability company, being first duly sworn, deposes and states:

I have read the foregoing Confession of Judgment and know the contents thereof, acknowledge that it is true and accurate and that I am duly authorized and qualified to execute this instrument on behalf of NOKLEY GROUP, LLC.

NOKLEY GROUP, LLC hereby confesses, authorizes, requests, and directs the entry of, when filed by the Clerk of the Court, this Confession of Judgment, which shall be a judgment in favor of Plaintiff against NOKLEY GROUP, LLC in the amount of \$200,000.00, including any additional attorneys' fees, costs of litigation and filing of the judgment, and related costs, plus post-judgment interest at the statutory rate on the outstanding balance until the judgment is paid in full.

NOKLEY GROUP, LLC,  
 a Nevada limited liability company

By: 

ROBERT W. NOKLEY, SR.

Address:

6391 Tropicana Place Ste  
Las Vegas, NV 89131

Subscribed and sworn to before me  
 this 1<sup>st</sup> day of ~~February~~ MARCH, 2017.

  
 NOTARY PUBLIC

